



June 18, 2021

Matt Lombardo  
MVP Health Insurance Company  
625 State Street  
Schenectady, NY 12305

Re: MVP Health Plan, Inc.  
2022 Vermont Exchange Rate Filing – Small Group  
SERFF Tracking #: MVPH-132824927  
Objection #3

Dear Mr. Lombardo:

The following additional information is required for this filing.

Notice regarding proper responses:

- A minimum-acceptable response to quantitative questions from us must include a spreadsheet calculation with retained formulas such that we can replicate the calculations therein.
- Explanatory responses are merely a supplement to the spreadsheet material and in of themselves will constitute a lack of response.

Questions:

1. We see from the actuarial memorandum that no reduction to market morbidity was assumed in relation to the American Rescue Plan Act. While we recognize that these new members will be making anti-selective decisions, they are by definition the population who chose not to elect coverage under the pre-existing subsidies that generated the 2020 market. Therefore, it would seem they will be almost guaranteed to be healthier than the average enrollee in the 2020 experience. Provide further explanation for why no adjustment is being made.
2. We acknowledge that the assumed cost and uptake rate of the COVID-19 booster is the same as the flu vaccine. Please disclose the dollar amount cost and percentage uptake rate assumed.
3. Please provide cited sources and support for the assumption that COVID-19 booster shows will be approved and needed as early as 2022.
4. Regarding the response to question #16 of the May 17<sup>th</sup> objection letter – please define the time period for the ‘pre-pandemic’ amounts shown and ‘post-pandemic’ amounts shown. Furthermore, please provide the utilization and average unit cost components of the total amounts provided.
5. Please provide the administrative costs PMPM as reported in the Supplemental Health Care Exhibit from 2015-2020.

6. Please provide a breakdown of the general administrative load of \$38.75 by major category.  
Please provide a similar breakdown for the combined market load as filed in 2021 of \$43.75.

To ensure that the review of your filing is completed before statutory deadlines, we expect you to respond as expeditiously as possible, but no later than June 25, 2020.

We trust that you understand these forms may not be used in Vermont until they are formally approved by the GMCB.

Sincerely,



Traci Hughes, ASA, MAAA  
Consulting Actuary  
Lewis & Ellis, Inc.  
thughes@LewisEllis.com  
(972)-850-0850